

**UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO**

In re:

PROMESA Title III

The Financial Oversight and Management
Board for Puerto Rico,

No. 17 BK 3283 (LTS)

As representative of

(Jointly Administered)

The Commonwealth of Puerto Rico, the
Employee Retirement System of the
Government of the Commonwealth of Puerto
Rico, and the Puerto Rico Public Buildings
Authority

Debtors

**INFORMATIVE MOTION OF SUCESIÓN PASTOR MANDRY MERCADO’S,
EXCEPTING JAVIER MANDRY MERCADO, REGARDING ITS INTENT TO
PARTICIPATE IN THE CONFIRMATION HEARING ON DEBTOR’S “SEVENTH
AMENDED TITLE III JOINT PLAN OF ADJUSTMENT OF THE COMMONWEALTH
OF PUERTO RICO, ET. AL.”**

TO THE HONORABLE COURT:

By counsel, Oscar Adolfo Mandry Aparicio; María del Carmen Amalia Mandry Llombart; Selma Verónica Mandry Llombart; María del Carmen Llombart Bas; Oscar Adolfo Mandry Bonilla; Gustavo Alejandro Mandry Bonilla; Yvelise Helena Fingerhut Mandry; Margaret Ann Fingerhut Mandry; Victor Robert Fingerhut Mandry; Juan Carlos Esteva Fingerhut; Pedro Miguel Esteva Fingerhut; Mariano Javier McConnie Fingerhut; Janice Marie McConnie Fingerhut, Victor Michael Fingerhut Cochran; Michelle Elaine Fingerhut Cochran; Rosa Estela Mercado Guzmán; Eduardo José Mandry Mercado; Salvador Rafael Mandry Mercado; Margarita Rosa Mandry Mercado; Adrián Roberto Mandry Mercado (hereafter collectively designated as “Sucesión Pastor Mandry Mercado”), hereby submits this informative motion. In support thereof Sucesión

respectfully states as follows:

1. On August 31, 2021, Sucesión Pastor Mandry Mercado, the holder of Amended proof of Claim Number 6272 for \$30,496,000.00, arising from an inverse condemnation judgment entered by the Court of First Instance of Puerto Rico, Superior Section of Ponce, filed an objection to the *Seventh Amended Title III Joint Plan of Adjustment of The Commonwealth of Puerto Rico, Et. Al.* (the “Plan of Adjustment”).

2. The undersigned counsel will speak on behalf of Sucesión Pastor Mandry Mercado at the confirmation hearing of Debtor’s Plan of Adjustment commencing on November 8, 2021, at 9:30 a.m.

3. The undersigned counsel may present oral argument on behalf of Sucesión Pastor Mandry Mercado.

4. The undersigned counsel reserves the right to be heard on any other matter raised by any party at the hearing on the confirmation of the Plan of Adjustment as concerns Sucesión Pastor Mandry Mercado related to the Case or Sucesión Pastor Mandry Mercado.

WHEREFORE, Sucesión Pastor Mandry Mercado respectfully requests that the Court take notice of the foregoing.

RESPECTFULLY SUBMITTED.

San Juan, Puerto Rico, this 28th day of September 2021

s/CHARLES A. CUPRILL-HERNÁNDEZ
USDC-PR 114312

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